

IMPLEMENTATION OF SECTION 1557 IN HEALTH CARE ORGANIZATIONS: THE DEVELOPMENT OF DISABILITY ACCESSIBILITY PROGRAMS AND POSITIONS



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BACKGROUND

- Section 1557 of the Affordable Care Act (ACA) prohibits health care organizations (HCOs) from discrimination based on disability
- HCOs with 15 or more employees are mandated to have a designated employee oversee compliance
- Study Objective: Understand how HCOs have implemented this new role



I feel like I wear so many hats that, sometimes, that does get put at the bottom of my to-do list. I wish I could be more available for people. The clinics don't always have the time either.

I think the purpose of my job here is to make sure that we are as compliant with the rules and regulations as possible, but also that we're doing the right thing for our patients so that we can impact some of those other areas. It's not just legal obligations, but it's promoting exceptional patient outcomes, trying to reduce our readmission rate, making sure that our patients understand the discharge recommendations that we give them, making sure that our providers are able to communicate with people in a way that they understand.

METHODS

- Interviews with individuals (n=18) leading disability accessibility at community and academic HCOs.
- HCOs ranging in size from one hospital to a system with 40 hospitals.

FINDINGS

- Participants held diverse job titles including: ADA Coordinator, Section 1557 Coordinator, and Interpretive Services Coordinator
- Participants held diverse job responsibilities
- Despite variation, participants reported similar goals of their position:
 1. Adherence to legal requirements
 2. Development of an organizational culture that prioritizes equal access to health care for patients with disability

Common Activities within Position

- Documenting and tracking patients' disability status and requested accommodations
- Responding to patient complaints
- Implementing trainings and serving as a resource for staff and providers
- Ensuring facilities and equipment are physically accessible
- Developing effective communication policies and procedures

Challenges within Position

- Lack of definition of role, with basic instruction of protecting the organization from potential lawsuits
- Expected duties within the roles often far exceeded capacity
- Necessary components to successful disability accessibility program that are not always offered:
 1. Adequate leadership support
 2. Dedicated budget
 3. Sufficient personnel
 4. Supportive organizational culture

CONCLUSION

For many HCO's, Section 1557 of the Affordable Care Act was the impetus for developing a formal disability accessibility program and dedicated position. While an important first step, broad variability still exists in how the position is conceptualized and significant barriers stagnate successful implementation.

IMPLICATIONS FOR POLICY AND PRACTICE

Additional policy direction and recommendations are needed to inform the implementation of disability accessibility programs that meet the requirements of the law, but also the purpose of the law: the provision of accessible, equitable health care to all patients with disability.